

REMARKS

The specification has been amended. Claims 1 - 20 have been amended. No new matter has been introduced with these amendments, all of which are supported in the specification as originally filed. Claims 1 - 20 remain in the application.

I. Drawing Correction

A proposed drawing correction is submitted herewith for Fig. 4, as discussed above in "Amendments to the Drawings". No new matter is introduced with this proposed correction, which is supported in the specification as originally filed.

II. Rejection under 35 U.S.C. §102(e)

Paragraph 4 of the Office Action dated November 2, 2004 (hereinafter, "the Office Action") states that Claims 1 - 20 are rejected under 35 U.S.C. §102(e) as being unpatentable over Mora et al., U. S. Patent 6,161,113. This rejection is respectfully traversed.

Applicants' independent Claims 1, 18, and 19 have been amended herein to more clearly specify that a user's selection of an element is "in a manner consistent with settings that are defined to indicate identification of dynamically-identified, user-defined organizing criteria".

For example, Applicants' specification notes that "swiping multiple times across some element of an object" is one approach to "indicate that this element should be selected as an

organizing criterion". (See p. 35, lines 13 - 15.) Thus, in this example, the settings would indicate the multiple number of required swipes, and the claim language "in a manner consistent with settings ..." means that the user has to "swipe multiple times across" some element of the object; if the user does not swipe that number of times, then according to the settings, the user has not identified a *dynamically-identified, user-defined* organizing criterion. Applicants' specification further notes that the settings may comprise a "user-specific configuration file" used to determine, for this specific user, what action this user must take to indicate a "swiping operation". (See p. 37, lines 7 - 15.)

Applicants find no teachings, nor any suggestion, in Mora of a user "select[ing] an element of a rendered representation ... in a manner consistent with settings that are defined to indicate identification of dynamically-identified, user-defined organizing criteria", as will now be discussed.

Figs. 2 - 6 and the text in col. 1, line 46 - col. 2, line 20 and col. 4, lines 26 - 60 are cited in the Office Action as pertaining to the "in a manner ... to indicate selection [now, "identification"]" claim limitation. However, according to Applicants' understanding, Figs. 2 - 6 are cited because they present a "tool bar" menu containing selectable icons and/or because they present user-selectable choices for accessing stored documents. The description of Fig. 3, for example, states that the menu shown therein can be used to access selected documents according to their status. (Col. 5, lines 8 - 10.) For example, the user might select Folder 1 ("Methodology

Documents"), view 1 ("In Work") to see in-progress documents, or view 2 of that folder ("Pending Approval") to see the Methodology documents that are awaiting approval.

However, Mora does not teach allowing the user to select an element of the rendered page to identify dynamically-identified, user-defined organizing criteria (in contrast to the first limitation of Applicants' independent claims) or storing such selection "in a repository of criteria usable for organizing electronic objects" (in contrast to the second limitation of Applicants' independent claims). For example, according to Applicants' claimed invention, a user presented with the rendering in Mora's Fig. 3 might repeatedly swipe over the word "chart" from the rendered text "Release Temp Chart 0.5", and then store this "chart" selection in a repository of organizing criteria. Subsequently, as claimed in Applicants' Claim 10, Applicants' user might then choose to use this newly-identified criterion in a rule to see all electronic documents that include the term "chart".

Mora's user, by contrast, can only choose from among pre-defined selection/indexing criteria. See, for example, col. 2, lines 19 - 20, which states "... documents are easy to locate, based on pre-determined selection criteria". See also col. 2, lines 65 - 67, specifying the actions that can be taken by Mora's users. Notably, identifying new organizing criteria is not included therein.

Col. 4, lines 26 - 60 of Mora pertain to user actions when interacting with "pre-

composed" or "user-composed" forms. The pre-composed forms are "included in the notebook upon initialization", and are therefore clearly not "dynamically-identified" or "user-defined". (Furthermore, a pre-composed form is not an "organizing criterion".) The user-composed forms include such things as meeting agendas. (Col. 4, line 44.) However, creating a form is patentably distinct from dynamically identifying an organizing criterion.

See also col. 7, lines 31 - 32, explaining that the status choices shown in Fig. 6 (for example, "to Baseline", "to In Work", and so forth) are the selectable choices for Mora's user. Col. 8, lines 29 - 30 also state that a user can select a particular view from submenu 72 of Fig. 7. Col. 9, lines 14 - 16 state that "Each view has a formula that determines which documents will appear in that view.". However, this is a static approach to presenting users with choices, and Applicants find no teachings in Mora of the dynamically-identified, user-defined organizing criteria provided by Applicants' claimed invention.

Accordingly, Applicants respectfully submit that their independent Claims 1, 18, and 19, are patentable over the cited reference.

Applicants also disagree with the analysis of their dependent claims. For example, Claim 3 specifies "... selection of a word, a phrase, or one or more contiguous characters in the rendered representation ...". Page 4, lines 1 - 3 of the Office Action discuss this claim, and cite col. 15, lines 3 - 6 of Mora. However, what is discussed therein is a form into which a user can enter

information. The rendered representation in this instance thus includes some type of data entry window or box. Typing text into that window or box (as provided by Mora's teachings) is patentably distinct from selecting something that is (already) rendered, which is the subject matter to which Applicants' Claim 3 is directed.

With regard to Claim 9, lines 4 - 5 on Page 5 of the Office Action cite Fig. 2 and col. 4, lines 9 - 25. However, Applicants find no teaching therein of anything that pertains to "an organizing criterion". With regard to Claim 10, lines 6 - 11 on Page 5 of the Office Action refer to "pre-determined selection criteria". Applicants' Claim 10 depends from Claim 1, and thus the limitations specified therein of dynamically-identified, user-defined organizing criteria carry forward to Claim 10. Clearly, pre-determined selection criteria (according to Mora) are patentably distinct from Applicants' dynamically-identified, user-defined organizing criteria.

With regard to Claim 16, lines 6 - 9 on Page 6 of the Office Action cite col. 4, lines 26 - 60 and col. 1, line 46 - col. 2, line 20. However, Applicants find no teaching therein of anything that pertains to "swiping" or swiping a "rendered representation ... multiple times".

Applicants also submit that their dependent Claims 2 - 17 and 20 are deemed patentable by virtue of the allowability of the independent claims.

The Examiner is therefore respectfully requested to withdraw the §102(e) rejection of all

claims.

III. Conclusion

Applicants respectfully request reconsideration of the pending rejected claims, withdrawal of all presently outstanding rejections, and allowance of all claims at an early date.

Respectfully submitted,



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